

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO. 21-
v.	: VIOLATIONS:
SUMO DUKULAH	: 18 U.S.C. § 1425(a) (procurement of citizenship through a false statement – 1 count)
	: 18 U.S.C. § 1425(b) (procurement of citizenship unlawfully – 1 count)

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about September 27, 2011, through on or about January 9, 2012, in the Eastern District of Pennsylvania, defendant

SUMO DUKULAH

knowingly procured, contrary to law, naturalization as a United States citizen for himself, by making in connection with his application for naturalization knowingly false representations and statements on his Form N-400, Application for Naturalization, and N-445, Notice of Oath Ceremony, and in sworn statements to immigration and naturalization officials, that he had not committed, assisted in committing, or attempted to commit a crime or offense for which he had not been arrested, when in fact, as defendant DUKULAH knew, these representations and statements were false based on his crimes committed beginning in or about 2004 through at least on or about January 9, 2012, that is, rape of a child, in violation of 18 Pa. C.S.A. § 3121(c) and related charges.

In violation of Title 18, United States Code, Section 1425(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 27, 2011, through on or about January 9, 2012, in the Eastern District of Pennsylvania, defendant

SUMO DUKULAH

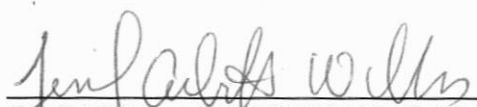
knowingly procured, obtained and applied for naturalization as a United States citizen for himself, to which he was not entitled, because at the of time of his application for naturalization:

- a. the defendant DUKULAH could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that he gave false testimony for the purpose of obtaining any benefits under Chapter 12 of Title 8 of the United States Code, as set forth and charged in Count One of this Indictment; and
- b. the defendant DUKULAH could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that in the years preceding the filing of his application for naturalization, he was raping a minor victim, including when she was less than 13 years old, and throughout the time he was pursuing his application for naturalization, he was engaging in sexual assault of a minor victim when she was less than 16 years old.

In violation of Title 18, United States Code, Section 1425(b).

A TRUE BILL:


FOREPERSON


JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

SUMO DUKULAH

INDICTMENT

Counts

18 U.S.C. § 1425(a) (procurement of citizenship through a false statement – 1 count)
18 U.S.C. § 1425(b) (procurement of citizenship unlawfully – 1 count)

A true bill

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____